

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
30 TWO BRIDGES ROAD
SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:
LEONARD HARRIS
DJAVANA MENTER-HARRIS

Case No.: 20-21298JKS

HEARING DATE: 12/10/2020

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- Debtor has failed to provide proof of income.
Specifically,
information supplied for 6 month period was illegible.

The debtor has failed to provide proof of current income. A paystub from debtor's employer dated no later than two weeks prior to the 341 date must be submitted.

The debtor has failed to provide proof of income for the six months preceding the filing of this case.
- Co-debtor / non filing spouse has failed to provide proof of income.
Specifically,
also need to verify when large loan deduction ends.
Specifically,
Failed to provide proof of current income. A paystub from employer dated no later than two weeks prior to the 341 date must be submitted.
- The attorney fee does not match that which is the balance on the plan. The GMC lease is not assumed in the plan and thus deemed rejected.
- The Trustee has reviewed last year's tax return and a substantial refund was received. The Trustee therefore requests that any refund above \$2,500.00 be turned over to the Trustee for the life of the plan.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: November 03, 2020

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee